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Office of the Secretary

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*ADMITTED IN TEXAS

March 11, 1991

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

In re: Telocator ~~Petition~~ for Rulemaking
RM-7617 ✓
Comments of McCaw Cellular Communications, Inc.

Dear Ms. Searcy:

Transmitted herewith on behalf of McCaw Cellular Communications, Inc. is an original and four copies of the "Comments of McCaw Cellular Communications" in support of the above-referenced Petition for Rulemaking seeking an allocation of the 930-931 MHz band for an Advanced Messaging Service.

Should there be any questions with regard to this matter, kindly communicate directly with the undersigned.

Very truly yours,



David C. Jatlow
Counsel for McCaw Cellular
Communications, Inc.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAR 11 1991

Federal Communications Commission
Office of the Secretary

In the Matter of:

Telocator Petition for)
Rulemaking to Amend Part 22 of)
the Commission's Rules Concerning) RM-7617
The Use of 930-931 MHz For An)
Advanced Messaging Service)

Comments of McCaw Cellular Communications, Inc.

The Paging Division of McCaw Cellular Communications, Inc. (hereinafter referred to as "MCC"), by its attorney, hereby submits its comments in support of the Petition for Rulemaking ("Petition") filed by Telocator seeking to amend Part 22 of the Commission's rules to implement an Advanced Messaging Service ("AMS") in the 930-931 MHz band. In support thereof, MCC states as follows:

Through a number of operating subsidiaries MCC holds more than 180 licenses under Part 22 to operate in excess of 1500 one-way signalling and two-way mobile radio common carrier facilities. In terms of the number of subscribers served MCC ranks among the top 5 radio common carriers in the U.S. As such, MCC is eminently qualified to provide comments in this matter.

MCC has carefully reviewed Telocator's Petition and agrees wholeheartedly that the 930-931 MHz band should be allocated for AMS. MCC's experience confirms the position articulated by Telocator that the growth of paging services has increased substantially. More importantly, however, MCC's experience supports Telocator's argument that increasingly more sophisticated

paging services are being offered and subscribed to by customers.

As the general population has become more accustomed to the benefits of being able to receive messages by radio, MCC has seen increasing demand for more sophisticated services. Initially tone only pagers comprised the bulk of service being offered. Tone only pagers have been largely replaced by numeric display pagers. Most recently as technology has advanced allowing more information to be easily transmitted to paging receivers, MCC has experienced substantial increased demand for alphanumeric pagers. In 1990, for example, MCC's alphanumeric pager growth rate was 130% and it projects a similar growth rate for alphanumeric pagers in 1991.

One particularly illustrative example of the manner in which advanced paging techniques have been used is MCC's experience in providing paging services for The Goodwill Games¹. MCC built a 34 transmitter system using a 900 MHz paging frequency to serve Western Washington² which covered the venues for The Goodwill Games. The purpose of the system was to provide an advanced alphanumeric paging service specifically for the international press corps covering The Goodwill Games.

Historically, reporters who wanted results of events would

¹ The Goodwill Games was an Olympic style international sporting event in which some 40 countries and almost 2500 athletes participated in numerous competitions in venues throughout the state of Washington. The Goodwill Games took place over a 17 day period in July and August, 1990.

² The coverage area of MCC's 900 MHz system encompasses the territory from the Canadian border to the Oregon border and, with the exception of the Olympic Peninsula, the area west of the Cascade Mountains.

wait at a common location for the results to be physically posted or listed. Therefore, reporters could be at the location at which event results were posted and not be able to fully cover events at other locations or they could cover events at other locations and risk not reporting the results of events on a timely basis. The paging system implemented for The Goodwill Games was designed to use alphanumeric paging receivers to dispatch event result information immediately to reporters wherever they were in the coverage area of the system. By utilizing the MCC paging system reporters could be in a venue covering one event and still receive timely results for all other events. Clearly, the use of MCC's advanced paging system allowed reporters to be substantially more efficient in the conduct of their business.

Based on the fact that MCC has experienced substantial demand for a variety of services using alphanumeric pagers and based on the success of the advanced paging system use for The Goodwill Games, MCC is currently investigating the possibility of implementing additional services which would fit under the category of services proposed by Telocator as Advanced Messaging Services.³

Strong evidence showing marketplace acceptance of and demand for increasingly sophisticated messaging services which can be delivered via paging receivers suggests to MCC that the Commission should allocate the 930-931 MHz band for AMS. Such an action by the Commission will help to ensure that the public is not deprived

³ MCC is not able to disclose at this time the nature of the services it is evaluating based on the proprietary nature of the conversations being held.

of receiving AMS.

As stated in Telocator's Petition, with the exception of the 930-931 MHz band which was formerly allocated for "advanced paging techniques"⁴, there is currently insufficient spectrum in the 900 MHz band or elsewhere to accommodate new AMS services.⁵ Therefore the only logical choice for an allocation for AMS services is in the 930-931 MHz band.

In its Petition Telocator has requested that any allocation for AMS should allow operators sufficient technical flexibility to accommodate existing and future AMS technologies. MCC supports that suggestion. A policy of technical flexibility will give service providers the freedom to meet varying market demands and to accommodate new technology in this field as it is developed. Such a policy is consistent with the FCC's general approach of refraining from adopting rules that might limit speedy implementation of new and innovative services.⁶

⁴ Amendment of Parts 2 and 22 of the Commission's Rules To Allocate spectrum in the 928-941 MHz band and to Establish Other Rules, Policies, and Procedures for One-Way Paging Stations in the Domestic Public Land Mobile Radio Service, First Report and Order, 89 F.C.C. 2d 1337 (Released May 14, 1982).

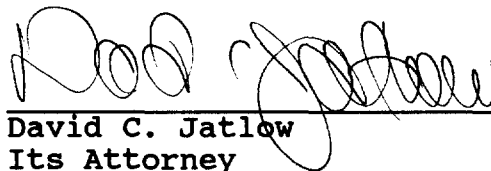
⁵ In this regard MCC's successful implementation of the wide-area alphanumeric 900 MHz service for The Goodwill Games was in part due to the fact that the 900 MHz frequency was not being used for more traditional paging services. The MCC system was capable of transmitting up to 256 characters as opposed to a more normal 80 characters. AMS services, which will require more capacity, can not efficiently share spectrum with existing traditional paging services.

⁶ See, for example, Amendment of Parts 2 and 22 of the Commission's Rules To Permit Liberalization of Technology and Auxiliary Service Offerings in the Domestic Public Cellular Radio Telephone Service, First Report and Order, 65 RR 2d 983 (released

For all of the foregoing reasons, the Paging Division of McCaw Cellular Communications, Inc. requests that the Commission grant Telocator's Petition for Rulemaking and institute a Notice of Proposed Rule Making seeking the allocation of the 930-931 MHz band for Advanced Messaging Services.

Respectfully submitted,

McCaw Cellular Communications, Inc.



David C. Jatlow
Its Attorney

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March 11, 1991

December 12, 1988).

Certificate of Service

I, David C. Jatlow, do hereby certify that I caused to be mailed, postage prepaid, this 11th day of March, 1991, a copy of the foregoing "Comments of McCaw Cellular Communications, Inc." to the following:

Eric DeSilva
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20005
Counsel for Telocator



David C. Jatlow